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 Apple Inc.

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

COREPHOTONICS, LTD.,  
 Plaintiff,  
 v.  
 APPLE INC.,  
 Defendant.

Case No. 3:17-cv-06457-JD (Lead Case)

Related Case Nos.

3:19-cv-04809-JD

**JOINT CASE MANAGEMENT  
 CONFERENCE STATEMENT**

Date: April 14, 2022  
 Time: 10:00 a.m.  
 Dept.: Courtroom 11  
 Judge: Honorable James Donato

Plaintiff Corephotonics, Ltd. (“Corephotonics”) and Defendant Apple Inc. (“Apple”) jointly submit this Case Management Statement in anticipation of the Case Management Conference scheduled for April 14, 2022. (Dkt. No. 43). Each of the above-captioned related patent infringement cases remains stayed by Order of the Court. Corephotonics has moved to lift the stay as to the instant case 3:17-cv-06457-JD, but it has not moved to lift the stay in the related case 3:19-cv-4809-JD. Apple opposes Corephotonics’ motion to lift the stay for the reasons explained in Apple’s opposition brief. Dkt. 121.

## I. JURISDICTION AND SERVICE

This is a patent infringement action. This Court has subject matter jurisdiction over this action at least under 28 U.S.C. § 1331 and 28 U.S.C. § 1338(a). Venue is proper in this Court pursuant to 28 U.S.C. §§ 1391 and 1400(b). All named parties have been served and there are no unresolved issues relating to service of process.

## II. FACTS

### Corephotonics’ Statement:

On November 6, 2017, Corephotonics brought a patent infringement suit against Apple in the United States District Court for the Northern District of California. In these consolidated cases, Corephotonics contends that Apple has and continues to willfully infringe five of Corephotonics’ patents relating to smartphone camera technology, in particular, small form-factor telephoto lens assembly and dual lens control and imaging technologies. The patents in suit are United States Patent Nos. 9,402,032 (the “’032 patent”), 9,568,712 (the “’712 patent”), 9,185,291 (the “’291 patent”), 9,538,152 (the “’152 patent”), and 9,857,568 (the “’568 patent”) (collectively “the Asserted Patents”).

Corephotonics respectfully directs the Court to Corephotonics’ Complaints, which provide a detailed descriptions of Corephotonics’ claims.

### A. Progress in the Case since the Original Case Management Conference

Prior to these cases being stayed, the parties had served their respective infringement, validity, and damages disclosures required under Patent Local Rules 3-1, 3-2, 3-3, 3-4, 3-8, and 3-9. Apple filed a motion to dismiss certain willful infringement claims, which the Court denied on October 1, 2018 (see Dkt. No. 90). The parties had filed the joint claim construction and prehearing statement, as

well as their opening and responsive claim construction briefs (see Dkt. Nos. 95, 96, and 98). The case was stayed on December 14, 2018, before the reply claim construction brief was due (see Dkt. No. 100).

Each of the five patents in suit in the instant cases was the subject of one or more IPR petitions filed by Apple:

<u>Asserted Patent No.</u>	<u>PTAB IPR No.</u>	<u>Date Filed</u>	<u>Status</u>
9,185,291	IPR2018-01348	July 13, 2018	Institution denied February 4, 2019 and Apple request for rehearing denied August 5, 2019.
9,402,032	IPR2018-01140	May 22, 2018	Claims 1, and 13–15 found unpatentable by PTAB; affirmed on appeal by Federal Circuit on October 25, 2021 (No. 20-1424).
9,538,152	IPR2018-01133	May 22, 2018	Claims 1–4 found unpatentable by PTAB; affirmed on appeal by Federal Circuit on May 20, 2021 (No. 20-1425); petition for rehearing filed and briefing completed March 29, 2022.
9,568,712	IPR2018-01146 IPR2018-01356	May 23, 2018 July 6, 2018	<u>IPR2018-01146:</u> PTAB determined that claims 15–17 shown to be unpatentable and claims 1, 2, 6, 7, 12–14, and 19 were found not unpatentable. On appeal to Federal Circuit (No. 20-1438), affirmed as to claims 1, 2, 7, 12–13, 15–17, and 19 and vacated and remanded to PTAB as to claims 6 and 14. Remand terminated by PTAB on February 11, 2022 following statutory disclaimer of claims 6 and 14.  <u>IPR2018-01356:</u> Institution denied February 5, 2019.
9,857,568	IPR2019-00030	October 3, 2018	Claims 1–5 found unpatentable by PTAB; affirmed on appeal by Federal Circuit on October 25, 2021 (No. 20-1961).

As a result of these IPRs, the claims of the '032, '568, and '152 patents that Corephotonics asserted against Apple in the instant cases have been found to be invalid. These IPR results are final, with the exception of the pending request for rehearing in the '152 IPR appeal.

1 As to the '712 patent, the PTAB's determination that claims 1, 2, 7, 12–13, and 19 are not  
2 shown to be unpatentable and that claims 15–17 are shown to be unpatentable is final, and appeals are  
3 exhausted. On December 9, 2021, Apple submitted a petition for *ex parte* reexamination of claims 3–  
4 6, 8–11, and 14 (Case No. 90/014,921). On January 11, 2022, Corephotonics submitted a statutory  
5 disclaimer of the claims challenged in the *ex parte* reexamination petition, and on February 15, 2022,  
6 the reexamination petition was denied.

7 As to the '291 patent, Apple's IPR petition was denied as stated above. On March 23, 2022,  
8 Apple submitted a petition for *ex parte* reexamination challenging claims 1–7, 10–14, 17, and 22 (Case  
9 No. 90/014,987). No decision has been made on whether to institute reexamination.

10 Given that claims of the '712 and '291 patents have been fully and finally resolved in the IPR  
11 proceedings some time ago, there is no reason to further delay proceedings in this case that was filed  
12 more than four years ago. While Corephotonics believes that the parties had a fair opportunity to brief  
13 issues relating to the current stay separately, Apple has insisted upon inserting extensive argument  
14 regarding those issues into its portion of this submission. Apple's conduct reflects an attempt to merely  
15 delay for the sake of delay. Apple argues that this Court should allow indefinite delay of consideration  
16 of serious claims of patent infringement for which Apple's collateral challenges have been soundly  
17 rejected. During the stay of this case, Apple has only continued to expand its extensive and willful  
18 infringement of Corephotonics' patents, continuing to sell previously-identified infringing products  
19 and releasing new and additional infringing products with full knowledge of its infringement. Apple  
20 has sold billions of dollars worth of infringing devices during the already-lengthy stay of this matter.  
21 Apple's gambit of seeking to indefinitely delay its accountability for this massive infringement must  
22 come to an end. Apple has demonstrated that it will file serial redundant proceedings (even though  
23 repeatedly unsuccessful) which serve little purpose other than delay. The Court should not permit such  
24 conduct to continue. Apple's suggestion that this case should wait for the outcomes of its serial  
25 challenges to other patents asserted in other cases reflects little more than delay for the sake of delay.  
26 Apple does not identify any coherent basis on which proceedings on the patents at issue in this case  
27 should be stalled indefinitely.  
28

**Apple's Statement:**

This action is only part of Corephotonics' campaign asserting a total of 13 related patents against the same Apple products between this consolidated action and related action 3:19-cv-4809-JD. The extensive overlap between the related actions is summarized in Apple's opposition to Corephotonics' motion to lift the stay. *See* Dkt. 121 at 1-6. All of the litigation across the three related actions is currently stayed at an early stage. *See id.* at 8; Dkt. 100 at 2 (order staying the -6457/-2555 action "in its beginning stages" where "the Court has not held a claim construction hearing"); Case No. 3:19-cv-4809, Dkt. 27 at 3 (order staying the -4809 action: "the case is still in its infancy. The Court has not yet held an initial case management conference or set a case schedule.").

The Court has already rejected Corephotonics' argument that any of the related cases should proceed separately in inefficient piecemeal litigation, given the extensive overlap across all three actions. As the Court previously explained when maintaining the stay in the -4809 action and reiterated when denying Corephotonics' motion to lift the stay in the -6475/-2555 action, "proceeding with any of the actions would 'risk inconsistent results with the IPR and Federal Circuit proceedings, especially because all three actions involve overlapping products and significant common discovery.'" Dkt. 112 at 3 (quoting Case No. 3:19-cv-4809, Dkt. 29 at 2-3). The same reasoning holds true today. A dozen Federal Circuit appeals are pending that address the invalidity of Corephotonics' related patents whose claim language overlaps extensively with the patents asserted in this action, in addition to the pending invalidity proceedings on the patents asserted in this action noted *supra* in Corephotonics' statement. *See also* Dkt. 121 at 1, 3-5.

On the merits, Apple denies that it infringes any of the asserted claims of the Asserted Patents, contends that the asserted claims are invalid under multiple grounds, and disputes Corephotonics' claims of alleged willfulness.

**III. LEGAL ISSUES**

The principal disputed legal issues are:

- Whether any of the accused products identified in Corephotonics' Complaints and Infringement Contentions directly or indirectly infringe any asserted claims of the Asserted Patents, literally or under the doctrine of equivalents;

- Whether Apple induced infringement of the Asserted Patents by its customers or others within the United States;
- Whether Apple's alleged infringement of the Asserted Patents was and continues to be willful;
- Construction of any disputed patent claim terms from the Asserted Patents;
- Whether this case is exceptional under 35 U.S.C. § 285;
- Whether Corephotonics is entitled to damages, and if so the amount;
- Whether Corephotonics is entitled to injunctive relief to prevent Apple's continuing infringement.

Apple's Statement:

In addition to the above,

- Whether any or all of the claims of the Asserted Patents are invalid;
- Whether any or all of the claims of the Asserted Patents are patent-ineligible.

#### IV. MOTIONS

As noted above, Apple's motion to dismiss certain willful infringement claims was denied (see Dkt. No. 90).

Pending before the Court is Corephotonics' motion to lift the stay in this case (see Dkt. No. 120). This motion is noticed to be heard at the same time as this case management conference.

#### Amendment of Infringement Contentions to Add Apple Products Introduced After Corephotonics' Infringement Contentions Were Served

**Corephotonics' Statement:** On September 21, 2018, between when Corephotonics served its Patent Local Rules 3-1 contentions and when the case was stayed, Apple introduced its iPhone XS and XS Max product models. Corephotonics believes these models infringe the '712 patent, and was in the process of meeting and conferring with Apple to add these two models to the case when the stay was entered (see Dkt. No. 84 at 4.) During the more than three years that the stay has been in place, Apple introduced additional product models that Corephotonics believes infringe the '712 and/or '291 patents. As set forth in Corephotonics' proposed schedule, Corephotonics requests that it be permitted a brief period of time to amend its '712 and '291 patent infringement contentions to add products the

1 iPhone XS and XS Max and any products that were introduced while the stay was in place.

2 **Apple's Statement:** The most efficient path for the Court and the parties is to maintain the  
3 stay across the three related Corephotonics actions until after the pending invalidity proceedings are  
4 completed, and conduct one efficient litigation at that time, rather than engaging in highly inefficient  
5 piecemeal litigation. Corephotonics's proposal would have the Court expend its resources conducting  
6 serial *Markman* proceedings, multiple rounds of dispositive motions, and multiple trials. *See* Dkt. 121  
7 at 1, 7-8. Indeed, by Corephotonics's own admission most of the asserted patents and claims already  
8 have been invalidated, and the remaining proceedings are likely to further narrow if not moot the  
9 remaining patents. Corephotonics can identify any products that it contends are relevant to the case,  
10 to the extent any valid asserted claims remain, all at once after the pending invalidation proceedings  
11 have completed. The best course to serve judicial economy thus is to first permit the Court and parties  
12 to receive the full benefit of completing the many pending invalidity proceedings and then this  
13 litigation can proceed in an efficient manner.

#### 14 **V. AMENDMENTS OF PLEADINGS**

15 No amendment of pleadings is necessary at this time.

#### 16 **VI. EVIDENCE PRESERVATION**

17 The parties have reviewed the District's Guidelines Relating to Electronically Stored  
18 Information ("ESI"). The parties have met and conferred regarding taking reasonable and proportional  
19 steps to preserve evidence relevant to the issues reasonably evident in this action, and an Order on ESI  
20 discovery was entered on June 26, 2018.

#### 21 **VII. DISCLOSURES**

22 The parties served their initial disclosures on April 11, 2018, and supplemental initial  
23 disclosures on June 6, 2018.

#### 24 **VIII. DISCOVERY**

##### 25 **A. Discovery to Date**

26 The parties have exchanged initial sets of discovery requests and responses. Both parties have  
27 produced documents, including the documents required by Patent L.R. 3-2 and 3-4.  
28

**B. E-Discovery Order and Protective Order Issues**

The Protective Order and Order on ESI discovery were entered on June 26, 2018.

**C. Issues Relating to Privilege and Privilege Log**

The parties will continue to work cooperatively to reach agreement on issues concerning privilege and privilege logs that is consistent with the needs of the case.

**D. Scope of Anticipated Discovery**

The scope of anticipated discovery remains unchanged from the Case Management Statement filed by the Parties on March 21, 2018. (Dkt. No. 32.)

**E. Changes to Discovery Limitations**

The parties agree that a one-day, seven hour deposition of an individual deposed in both their individual capacity and in their capacity as a 30(b)(6) representative counts as a single deposition for the purposes of the limit of ten party depositions as in Fed. R. Civ. P. 30(a). The parties further agree that the depositions of expert witnesses should not count towards the ten deposition limit. The parties currently do not propose any changes to the default discovery limitations.

**IX. CLASS ACTION**

This case is not a class action.

**X. RELATED CASES**

Cases 17-cv-06457 and 18-cv-02555 are consolidated and pending as 3:17-cv-06457-JD. On October 7, 2019, the Court issued an order relating this consolidated case with 3:19-cv-04809-JD. (Dkt. No. 104.)

**XI. RELIEF**

**Corephotonics' Statement:** Corephotonics seeks a finding of an award of damages resulting from the acts of Apple's infringement, including, without limitation, no less than a reasonable royalty pursuant to 35 U.S.C. § 284, together with interests and costs; an award of enhanced damages pursuant to 35 U.S.C. § 284 due to Apple's willful infringement; injunctive relief against Apple engaging in infringement of the Asserted Patents; Corephotonics' costs; and such other relief at law and in equity as the Court may deem just and proper. Corephotonics further outlines its claims for damages below. Corephotonics further seeks a finding that this is an exceptional case under 35 U.S.C. § 285 and an



award of Corephotonics' reasonable attorney's fees in connection with this action. Insofar as the Court does not enter a permanent injunction, Corephotonics seeks a compulsory forward royalty.

**Apple's Statement:** Apple denies the allegations of infringement, including willful infringement, and contends that the asserted patent claims are invalid. Apple has not asserted any counterclaims to date, and it does not currently seek any damages. Apple reserves the right to seek an award of costs, expenses, and/or reasonable attorneys' fees in connection with this action should this prove to be an exceptional case, as well as any other award that the Court deems just and proper.

## **XII. SETTLEMENT AND ADR**

The parties have conducted three mediations with the Hon. Mag. Judge Gandhi (Ret.), most recently on May 4, 2021. The parties have not yet reached a resolution through mediation.

## **XIII. CONSENT TO MAGISTRATE JUDGE FOR ALL PURPOSES**

The parties do not consent to have a magistrate conduct all further proceedings including trial and entry of judgment.

## **XIV. OTHER REFERENCES**

At this time, the parties do not believe that this case is suitable for reference to binding arbitration, a special master, or the Judicial Panel on Multidistrict Litigation.

## **XV. NARROWING ISSUES**

Currently, the parties have no suggestions to expedite the presentation of evidence at trial or any requests to bifurcate issues, claims, or defenses.

## **XVI. EXPEDITED TRIAL PROCEDURE**

At this time, the parties do not believe that this case is appropriate for the Expedited Trial Procedure of General Order No. 64 Attachment A.

## **XVII. SCHEDULING**

**Corephotonics' Statement:** When this case was stayed, the case was approximately 13 months before trial. (Dkt. No. 67.) Corephotonics proposes resuming the case with approximately the same timeline as in the prior scheduling order, subject to any adjustments that are required by the Court's calendar:

<u>Scheduled Event</u>	<u>Prior Date</u>	<u>Proposed Date</u>
Plaintiff's Reply Brief on Claim Construction	December 14, 2018	April 22, 2022
Plaintiff to Amend Infringement Contentions to Add Apple Products Introduced Since Infringement Contentions Served	N/A	April 29, 2022
Claim Construction Hearing	January 17, 2019	May 26, 2022 10:00 a.m.
Close of Fact Discovery	May 3, 2019	September 9, 2022
Opening Expert Reports	June 3, 2019	October 10, 2022
Rebuttal Expert Reports	July 2, 2019	November 8, 2022
Close of Expert Discovery	July 26, 2019	December 2, 2022
Last Day to File Dispositive Motions (one per side in the entire case) and <i>Daubert</i> Motions	<b>Motions:</b> August 22, 2019 <b>Responses:</b> September 19, 2019 <b>Replies:</b> October 3, 2019	<b>Motions:</b> December 22, 2022 <b>Responses:</b> January 19, 2023 <b>Replies:</b> February 2, 2023
Hearing on Dispositive Motions	October 24, 2019	March 2, 2023 10:00 a.m.
Final Pretrial Conference	December 19, 2019	April 27, 2023 1:30 p.m.
Jury Trial	January 13, 2020	May 22, 2023
Length of Trial	5 days	5 days

**Apple's Statement:** The Court should maintain the stay of litigation across the three related Corephotonics actions for the reasons previously articulated by the Court in ordering and maintaining the stay (Dkt. 100, 112) and reiterated in Apple's recent opposition to Corephotonics' motion to lift the stay (Dkt. 121). The much more efficient course for the Court and parties is to permit the pending invalidity proceedings to conclude before this litigation resumes, on one track, with one updated claim construction proceeding that accounts for all of the new relevant intrinsic record that has been generated during the stay, with Corephotonics asserting any remaining asserted patents and asserted claims against any Apple products that Corephotonics may properly accuse.

The Court should reject Corephotonics' attempt to wastefully burden the Court and parties with inefficient piecemeal litigation by resuming litigation now on only a small subset of the thirteen (or more) related patents Corephotonics asserts against Apple, when Corephotonics will later seek to proceed on additional closely-related patents with overlapping claim scope against the same products.

Corephotonics’ proposed schedule fancifully imagines that the years of newly-developed intrinsic record and Federal Circuit rulings during the stay have no bearing on claim construction, such that the parties could simply pick up where they left off with Corephotonics’ reply claim construction brief. Not so. Since the stay was imposed, Corephotonics is now on record with hundreds of pages of new arguments attempting to distinguish the prior art, all of which is relevant new intrinsic evidence for consideration in claim construction. *See Aylus Networks, Inc. v. Apple Inc.*, 856 F.3d 1353, 1360-62 (Fed. Cir. 2017). For example, during the stay, Corephotonics raised new arguments to the Patent Office attempting to distinguish invalidating prior art based on its view of the meaning of the claim terms “fuse” and “particular point of view,” which are both recited in the asserted claims of the ’291 patent asserted in this action. *See, e.g.*, IPR2020-00862, Paper 35 (Final Written Decision) at 66, 67; Dkt. 95 (JCCS) at 5-6 (noting disputed language in ’291 patent including “fused” output image “from a particular point of view”). That Patent Office proceeding is now under review on appeal at the Federal Circuit. Similar issues exist with respect to the ’712 patent in view of proceedings at the Patent Office, for example regarding the meaning of the term “TTL.”

Thus, the outdated claim construction submissions in this litigation will already need to be redone in any event, and the many pending Federal Circuit appeals on the closely-related patents with substantially the same claim language will further inform claim construction across the related actions, including the subset of patents that were subject to the outdated prior claim construction briefing in 2018. *See* Dkt. 121 at 3-6; Dkt. 95, 96, 98 (prior claim construction filings in 2018). Rather than waste the Court’s time with serial claim construction proceedings addressing substantially overlapping claim language on an incomplete record, as Corephotonics proposes, the Court should maintain the stay until a later appropriate time to conduct a single updated claim construction proceeding.

Corephotonics’ misguided effort to rush forward with inefficient piecemeal litigation is further underscored by its ill-advised proposal to add new accused products *after* completing *Markman* briefing, which makes no sense. The Patent Local Rules rightly contemplate that the parties exchange infringement and invalidity contentions *before* moving forward with claim construction positions in order to properly inform the *Markman* issues for the Court and the parties. *See* P.L.R. 3-1, 3-3, 4-1 *et*

1 *seq.* Again, the best course here is to maintain the stay in order to enable a much more efficient and  
 2 properly-staged single track of litigation after conclusion of the pending invalidity proceedings.

### 3 **XVIII. TRIAL**

4 Corephotonics and Apple have demanded that the case be tried by jury.

#### 5 **Corephotonics' Statement:**

6 To the extent a trial occurs, Corephotonics currently expects that trial will take approximately  
 7 five (5) days, which was the length that the parties estimated prior to the cases being stayed. (Dkt. No.  
 8 32 at 7.)

#### 9 **Apple's Statement:**

10 Apple believes that it is premature to address the potential length of trial at this time because  
 11 the scope and size of any case that may be presented at trial still remains to be determined, including  
 12 potential impacts arising from upcoming rulings in the pending Federal Circuit appeals.  
 13 Corephotonics' citation to an outdated prior statement from years ago "prior to the cases being stayed"  
 14 is misplaced and moot in view of Corephotonics' subsequent expansion of the litigation and the  
 15 progress of invalidity proceedings, which have dramatically reshaped the litigation since then.

### 16 **XIX. DISCLOSURE OF NON-PARTY INTERESTED ENTITIES OR PERSONS**

17 Pursuant to paragraph 19 of the Standing Order for All Judges re Contents of Joint Case  
 18 Management Statement, the parties have filed Certifications of Interested Entities or Persons as  
 19 required by Local Rule 3-15.

20 **Corephotonics' Statement:** Samsung Electronics Benelux B.V. owns a majority of the  
 21 outstanding shares of Corephotonics. No publicly-held corporation owns 10% or more of  
 22 Corephotonics' stock.

### 23 **XX. PROFESSIONAL CONDUCT**

24 The parties confirm that all attorneys of record for the parties have reviewed the Guidelines  
 25 for Professional Conduct for the Northern District of California.

### 26 **XXI. OTHER MATTERS**

27 The parties' statements pursuant to Patent Local Rule 2-1 remain unchanged from the Case  
 28 Management Statement filed by the Parties on March 21, 2018. (Dkt. No. 32 at 8–10.)

1  
2 Dated: April 7, 2022

RUSS AUGUST & KABAT

3  
4 /s/ Marc A. Fenster

5 Marc A. Fenster  
6 Attorneys for Plaintiff Corephotonics,  
7 LTD.

8  
9 Dated: April 7, 2022

COOLEY LLP

10  
11 /s/ Heidi L. Keefe

12 Heidi L. Keefe  
13 Attorneys for Defendant Apple Inc.  
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**FILER'S ATTESTATION**

I, Marc A. Fenster, am the ECF user whose identification and password are being used to file the instant document. Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that all counsel whose electronic signatures appear above provided their authority and concurrence to file this document.

/s/ Marc A. Fenster

Marc A. Fenster